

**TRENK, DiPASQUALE,
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Joshua H. Raymond
Special Bankruptcy Counsel for the City of Linden

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:	:	Chapter 13
	:	
RAYMOND L. HAYES,	:	
	:	Case No. 16-28043(VFP)
	:	
Debtor.	:	Hearing Date: June 1, 2017
	:	Hearing Time: 11:00 a.m.
	:	

**NOTICE OF MOTION TO AUTHORIZE
THE CITY OF LINDEN TO SELL TAX SALE CERTIFICATE**

TO:

Honorable Vincent F. Papalia
Bankruptcy Judge United States
Bankruptcy Court Martin Luther
King, Jr. Fed Bldg.
50 Walnut Street, Third Floor
Newark, NJ 07102-2506

Raymond L. Hayes
906 East Baltimore Avenue
Linden, NJ 07036
Debtor

Harvey I. Marcus, Esq.
250 Pehle Ave.
Suite 200
Saddle Brook, NJ 07663
Counsel for Debtor

Marie-Ann Greenberg
30 Two Bridges Rd.
Suite 330
Fairfield, NJ 07004
Chapter 13 Trustee

PLEASE TAKE NOTICE that the undersigned, attorneys for the City of Linden (the “City”), shall appear before the Honorable Vincent F. Papalia, United States Bankruptcy Judge for the District of New Jersey, Martin Luther King, Jr. Federal Building, 50 Walnut Street, 3rd Floor, Courtroom 3A, Newark, New Jersey, on the **1st day of June, 2017 at 11:00 a.m.**, or as soon thereafter as the Court permits, for the entry of an Order of the Court providing as follows:

1. Authorizing the City to conduct a tax sale concerning the Debtor's municipal charge arrearages.

2. For such other and further relief as the Court deems just and equitable.

PLEASE TAKE FURTHER NOTICE that in support of the within Motion, the undersigned shall rely upon the Application submitted herewith and oral argument.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy in accordance with D.N.J. LBR 9013-2.

PLEASE TAKE FURTHER NOTICE that as the Motion does not involve any complex issue of law, no brief is required.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, the Motion shall be deemed and the relief may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that oral argument is hereby waived unless timely objection is received.

PLEASE TAKE FURTHER NOTICE that an order granting the relief requested herein is submitted herewith and made part of the Motion herein.

**TRENK, DiPASQUALE,
DELLA FERA & SODONO, P.C.**
Special Bankruptcy Counsel for the City of Linden

By: /s/ Joshua H. Raymond
Joshua H. Raymond

Dated: April 24, 2017